

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

RONALD KOONS, *et al.*,

Plaintiffs,

v.

WILLIAM REYNOLDS, *et al.*,

Defendants.

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:  
: No. 1:22-cv-07464-RMB-EAP

:  
: **STIPULATION**

WHEREAS, Plaintiffs commenced this action against five official capacity Defendants responsible for enforcing the challenged provisions of Chapter 131 of the 2022 Laws of New Jersey; and

WHEREAS, Attorney General Matthew Platkin and State Police Superintendent Patrick Callahan, represented by the Attorney General's office, are defending the challenged provisions; and

WHEREAS, Atlantic County Prosecutor William Reynolds, Camden County Prosecutor Grace MacAulay and Acting Sussex County Prosecutor Annemarie Taggart (collectively the "County Prosecutors") acknowledge and agree that they must comply with the Court's orders and injunctions regarding the enforcement of Chapter 131 (and the orders or mandates of any other court with jurisdiction), regardless of whether they are parties to this action or not; and further, the County Prosecutors specifically pledge to do so; and

Dated this 7th day of February, 2023

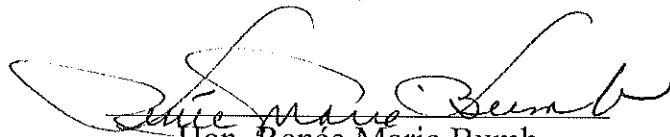
<p>Plaintiffs Ronald Koons, Nick Gaudio, Jeffrey M. Muller, Second Amendment Foundation, Firearms Policy Coalition, Coalition of New Jersey Firearm Owners and New Jersey Second Amendment Society,</p> <p><u>s/ David D. Jensen</u>  David D. Jensen  David Jensen PLLC  33 Henry Street  Beacon, New York 12508  Tel: 212.380.6615  david@djensenpllc.com</p>	<p>Defendants Matthew Platkin and Patrick Callahan and Acting Sussex County Prosecutor Annmarie Taggart,</p> <p><u>s/ Angela Cai</u>  Angela Cai  Deputy Solicitor General  Office of the Attorney General  P.O. Box 080  Trenton, New Jersey 08625  Tel: (609) 376-2791  Angela.Cai@njoag.gov</p>
<p>Defendant Atlantic County Prosecutor William Reynolds,</p> <p><u>s/ Alan Cohen</u>  Alan Cohen  Atlantic County Department of Law  1333 Atlantic Avenue, 8<sup>th</sup> Floor  Atlantic City, NJ 08401  609-343-2279  Cohen_Alan@aclink.org</p>	<p>Defendant Camden County Prosecutor Grace MacAulay,</p> <p><u>s/ Harold Goldberg</u>  Howard Goldberg  First Assistant County Counsel  520 Market Street, 6<sup>th</sup> Floor  Camden, New Jersey 08102-1375  (856) 225-5543  Howard.Goldberg@camdencounty.com</p>

WHEREAS, Plaintiffs have prepared an Amended Complaint that omits the County Prosecutors as Defendants, and as well, challenges additional “sensitive place” restrictions in Chapter 131 and includes one additional Plaintiff,

NOW THEREFORE, it is hereby stipulated, ordered and agreed that:

1. The claims against Defendants Atlantic County Prosecutor William Reynolds, Camden County Prosecutor Grace MacAulay and Acting Sussex County Prosecutor Annemarie Taggart shall be and hereby are DISMISSED without prejudice pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure;
2. Plaintiffs will file their Amended Complaint on February 7, 2023 and their pending preliminary injunction motion shall include the additional “sensitive places” challenged therein; and
3. The Court’s temporary restraining order (Doc. No. 35) shall remain in full force and effect, and the parties shall submit their remaining preliminary injunction briefing in accordance with the schedule proposed previously.

It is **SO ORDERED** this 8<sup>th</sup> day of February, 2023.

  
Hon. Renée Marie Bumb  
United States District Court Judge